

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

§ **MDL NO. 2875**

§ **HON. ROBERT B. KUGLER**

**THIS DOCUMENT RELATES TO:**

*Georgia Murawski v. Zhejiang Huahai  
Pharmaceutical Co. Ltd., et al.*

Case No. 1:20-cv-14302-RBK-JS

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**CORRECTED AMENDED NOTICE OF VIDEOTAPED DEPOSITION  
OF JOHN FITZPATRICK, M.D.**

**PLEASE TAKE NOTICE** that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S. Inc., Solco Healthcare U.S., LLC, and Prinston Pharmaceutical Inc., will take the deposition upon oral examination of John Fitzpatrick, M.D., on **November 3, 2021 at 10:00 a.m.** ET via remote deposition while the witness is at his home or office or other location agreed to by the parties. Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should contact Golkow Technologies at [scheduling@golkow.com](mailto:scheduling@golkow.com) to arrange for login credentials to be sent to them prior to the deposition. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and videographer will be an employee or agent of Golkow Technologies.

The attorney contact for the deposition is:

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October 20, 2021

Respectfully submitted,

/s/ Dawnn E. Briddell  
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*Attorney for Zhejiang Huahai  
Pharmaceutical Co., Ltd., Huahai U.S. Inc.,  
Solco Healthcare U.S., LLC, and Princeton  
Pharmaceutical Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of October, 2021, I caused a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of John Fitzpatrick, M.D. to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants:

Marlene Goldenberg, Esq. (counsel for Plaintiff)

Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)

Daniel A. Nigh, Esq. (via email)

Ruben Honik, Esq. (via email)

David Stanoch, Esq. (via email)

Conlee Whiteley, Esq. (via email)

Seth A. Goldberg, Esq. (via email)

Jessica Priselac, Esq. (via email)

Clem C. Trischler, Esq. (via email)

Sarah E. Johnston, Esq. (via email)

Golkow Technologies (via email)

/s/ Dawnn E. Briddell

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